UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI

MISSOURI STATE CONFERENCE OF)
THE NATIONAL ASSOCIATION FOR)
THE ADVANCEMENT OF COLORED)
PEOPLE, ET AL.,)
)
Plaintiffs,)
)
v.) No. 4:14-cv-02077-RWS
)
FERGUSON-FLORISSANT SCHOOL)
DISTRICT and ST. LOUIS COUNTY)
BOARD OF ELECTIONS)
COMMISSIONERS,)
Defendants.)

Motion to Modify Judgment to Include Voter Education Program and Apportion Costs

Come now Plaintiffs and move this Court to modify its judgment to include the parties' proposed voter education program and apportion the costs for that program between Defendants. In support, they state:

- 1. Judgment in this case was entered on November 21, 2016. ECF No. 213.
- 2. On December 6, 2016, the parties submitted their joint propose voter education program. ECF No. 225.
- 3. Although the parties reached agreement on what the voter education program should entail, there has been no agreement as to who should bear the costs of the program, with the exception that Ferguson Florissant School District to be responsible for the production of certain items.
- A voter education program is an essential part of the remedy ordered by this
 Court.

WHEREFORE Plaintiffs request this Court modify its judgment to include an order requiring

Defendants to implement a voter education program and apportioning the costs for that program

between Defendants.

Respectfully submitted,

/s/ Anthony E. Rothert ANTHONY E. ROTHERT, #44827MO ACLU of Missouri Foundation 454 Whittier Street St. Louis, Missouri 63108 Phone: (314) 652-3114

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2016, I filed the foregoing document using the efiling system, thereby serving electronic copies via email to all named parties below:

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